

United States Department of Justice
Office of the United States Trustee
300 Plaza Tower
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
REMARKABLE HEALTHCARE OF	§	Case No. 18-40295
CARROLLTON, LP	§	Chapter 11
	§	
DEBTORS.	§	Jointly Administered Under Case No. 18-40295
	§	

**OBJECTION OF THE U.S. TRUSTEE
TO ISSUANCE OF FINAL DECREE AND REQUEST FOR HEARING**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE PRESIDING:

COMES NOW the United States Trustee and files this Objection to the Issuance of a Final Decree in this case and in support thereof would show the court as follows:

1). A Plan of Reorganization was confirmed in this case by Order of May 16, 2019. On February 4, 2020, the Debtors filed an Application for Final Decree (*Docket #446*).

2). On January 27, 1996, 28 U.S.C. §1930(a)(6) was amended to require the payment of quarterly fees to the United States Trustee in every Chapter 11 case until the case is dismissed or converted to another chapter, or the case is closed. Section 1930(a)(6), as amended, now provides that quarterly fees shall be paid " in each case under chapter 11 of title 11 for each quarter . . . until the case is converted or dismissed, whichever occurs first." H.R. Conf. Rep. No. 378, 104th Cong., 1st Sess. 15-25 (1995), printed in 141 Cong. Rec. H13874-01, H13878 (1995); 28 U.S.C. '1930(a)(6). Accordingly, Congress has mandated that quarterly fees be paid in all open chapter 11 cases, including those with previously confirmed plans.

3). Debtors have failed to timely pay quarterly fees ("Fees") to the United States

Trustee in amounts below:

- **Remarkable Healthcare of Carrollton -\$4,885.69;**
- **Remarkable Healthcare of Dallas-\$4,891.24;**
- **Remarkable Healthcare of Ft. Worth -\$71,032.24;**
- **Remarkable Healthcare of Seguin -\$4,885.69;**
- **Remarkable Healthcare, LLC -\$662.46;**

This consists of the 4th quarter 2019. Debtors will also owe Fees for the 1st quarter 2020.

The Quarterly Fees are owed and should be paid through the case closing.

4.) The United States Trustee objects to issuance of a Final Decree until the Fees are paid.

WHEREFORE, PREMISES CONSIDERED, the United States Trustee requests this Court deny the issuance of a Final Decree in this case until Debtors have made payment of all Quarterly Fees owed to the U.S. Trustee. In the alternative, the U.S. Trustee requests this Court to issue an order requiring the reorganized Debtor to pay all Quarterly Fees due and owing through the issuance of the Final Decree. This payment should be made within 10 days of the date of entry of the Final Decree.

Dated: January 29, 2020

Respectfully submitted,

WILLIAM T. NEARY
UNITED STATES TRUSTEE

By: /s/John Vardeman
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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing document was served on the following listed persons through the courts electronic notification system as permitted by Appendix 5005 II. B. 2 to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage prepaid, no later than the 20th of February 2020.

/s/ John Vardeman
John Vardeman

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Carrollton, TX 75010

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Dallas, TX 75216

Remarkable Healthcare of Fort Worth, LP
6649 N. Riverside Drive
Fort Worth, TX 76137

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